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5 || Attorney for Defendant SAUL FIGUEROA-FIERROS

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

(Hon. William Q. Hayes)

12 UNITED STATES OF AMERICA,) Criminal No. 08-CR0943-WQH
13 Plaintiff,) EX-PARTE MOTION FOR ORDER
14 v.) SHORTENING TIME TO FILE
15 SAUL FIGUEROA-FIERROS) DEFENDANT'S SENTENCING
16 Defendant.) MEMORANDUM
Motion Date: July 25, 2008
Time: 9:30 a.m.

18 Counsel for the defendant SAUL FIGUEROA-FIERROS hereby moves
19 this Court for an order shortening time for the filing of DEFENDANT'S SENTENCING
20 MEMORANDUM for one day to July 21, 2008. The request is made on the ground
21 that good cause exists for the granting of such motion as more fully set forth in the
22 attached Declaration of Counsel in Support of Ex-Parte Motion for Order Shortening
23 Time to File Defendants Sentencing Memorandum.

24 || Dated: July 21, 2008

/s/ Stephen D. Lemish
Stephen D. Lemish, Attorney for Defendant
SAUL FIGUEROA-FIERROS
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

(Hon. William Q. Hayes)

12 UNITED STATES OF AMERICA,) Criminal No.08-CR0943-WQH
13)
14 Plaintiff,) DECLARATION OF COUNSEL IN
15 v.) SUPPORT OF EX-PARTE MOTION
16 SAUL FIGUEROA-FIERROS,) FOR ORDER SHORTENING TIME
17 Defendant.) TIME TO FILE DEFENDANT'S
) SENTENCING MEMORANDUM
)
) Motion Date: July 25, 2008
) Time: 9:30 a.m.

I, Stephen D. Lemish, am the attorney of record for the above-noted defendant. I declare as follows:

1. The Defendant's Sentencing Memorandum was to be filed by July 20, 2008, pursuant to local rules and general orders and an order in the above-captioned matter.

2. The Defendant's Sentencing Memorandum is being filed late due to recently learning of various matters and press of business.

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1 3. The Defendant's Sentencing Memorandum is well founded and
2 necessary to the client's representation.

3 I declare under penalty of perjury under the laws of the United States
4 the foregoing is true and correct.

5 Dated: July 21, 2008

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7 _____
8 /s/ Stephen D. Lemish
9 Stephen D. Lemish, Declarant
10 steve.lemish@sbcglobal.net

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